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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

ALONZO WILLIAMS, and

ALPHONSO WILLIAMS

Defendants.

No. 3:23-mj-486-KFR

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, ALEXANDER L. BROWN, having been first duly sworn, do hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a United States Postal Inspector with the United States Postal Inspection Service (USPIS). I am assigned to investigate the unlawful transportation of contraband, including Title 21 controlled substances, through the United States Mail.
2. I have been a Postal Inspector since November 2021, and I am currently assigned to the Seattle Division, specifically to the Anchorage Domicile, which is responsible for investigation of control substance law violations involving the United States mail. Prior to being a Postal Inspector, I had been a Federal Criminal Investigator since 2011 (2011-2013 with the US Marine Corps Criminal Investigation Division (CID), 2013-2015 with the Naval Criminal Investigative Service, 2016 to 2021 with the US Army CID).

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3. As part of my duties as a U.S. Postal Inspector, I investigate drug trafficking organizations, including their smuggling routes and the techniques that they use for transporting controlled substances such as marijuana, cocaine, methamphetamine, and heroin. My duties include investigating drug trafficking organizations, interviewing witnesses, victims and suspects, identifying people involved, developing probable cause for cases, handling and processing various types of evidence, and assembling cases for prosecution. I have conducted and/or participated in numerous investigations relating to the use, possession, manufacture, and trafficking of controlled substances, and I have become familiar with devices, paraphernalia, techniques, and practices used by people engaged in the use, possession, manufacture, and trafficking of controlled substances. I have also conducted and/or participated in investigations which have resulted in the seizure of marijuana, cocaine hydrochloride, opium, heroin, methamphetamine, MDMA (ecstasy), prescription medications, firearms, cellular phones, surveillance systems, cameras, memory cards, computers, documents, money, and precious metals. I have also conducted numerous interviews of people involved in the use, possession, manufacture, and trafficking of controlled substances which have added to my knowledge of the illegal drug culture that exists in Alaska.

4. I make this affidavit in support of an application for a criminal complaint and arrest warrant pursuant to Federal Rules of Criminal Procedure 3 and 4. As explained more fully below, I have probable cause to believe that Alonzo Williams and Alphonso Williams have committed the following federal criminal offenses:

Count 1: Beginning on a date unknown, but no later than August 21, 2023,

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and continuing to on or about August 29, 2023, within the District of Alaska, at or near Anchorage, the defendants, ALONZO WILLIAMS and ALPHONSO WILLIAMS knowingly and intentionally combined, conspired, confederated and agreed with other individuals known and unknown, to distribute a quantity of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (Fentanyl).

Count 2: That on or about August 29, 2023, within the District of Alaska, at or near Anchorage, the defendant, ALONZO WILLIAMS knowingly attempted to possess with intent to distribute a quantity of a mixture or substance containing a detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (Fentanyl) and did something that was a substantial step toward committing that crime.

5. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents and witnesses. Because the affidavit is intended to establish probable cause to support a complaint and secure an arrest warrant, I have not included each and every fact known to me concerning this investigation.

FACTS ESTABLISHING PROBABLE CAUSE

6. On May 18, 2023, while researching USPS business records, Agents of the United States Postal Inspection Service (USPIS) identified a USPS Priority Mail package addressed to an address, later determined to be used as a short-term rental property (the “rental property”), in Anchorage, Alaska, with a named recipient whom investigators later determined to be a fictitious identity. The return address was a city in San Bernadino County in Southern California. The package is referred to as the subject parcel. USPIS identified the subject parcels as suspicious based on a variety of factors known to be common indicators of drug trafficking.

7. On August 25, 2023, USPIS Agents conducted surveillance of the rental property,

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known to be the destination of the subject parcel, and observed a silver Volkswagen Jetta pull into the driveway. Per the Jetta's license plate, Alaska DMV records identified the registered owner as 24-year-old ALPHONSO WILLIAMS ("ALPHONSO") of Wasilla. ALPHONSO is the brother of ALONZO WILLIAMS ("ALONZO"). ALPHONSO was also known to be in jail at the time of this observation as he was arrested on August 21, 2023, by Alaska State Troopers at the Ted Stevens International Airport, Anchorage, AK, for possession of suspected fentanyl laced pills. ALPHONSO had just returned to Anchorage from Southern California when he was arrested. The subject parcel was mailed from Southern California while ALPHONSO would have been there.

8. On August 25, 2023, a Federal Magistrate Judge issued a search warrant for the subject parcel. Later, law enforcement agents executed the search warrant and searched the contents of the subject parcel. The search resulted in the discovery of approximately 16,698 gross grams of blue round "M/30" stamped pills that, based on my training and experience, I suspected to contain fentanyl.

9. Evidence collected to-date indicates that ALONZO communicated to one or more websites and/or persons associated with the rental property and, further, that such communications indicate that ALONZO expected to be able to control the rental property sufficiently on or about August 29, 2023, so as to be able to receive a delivery at the rental property. This information, based on my training and experience, indicates that ALONZO made plans to receive the subject package at the rental property on August 29, 2023.

10. On August 29, 2023, law enforcement agents conducted a controlled delivery

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operation of the subject parcel. During the operation, law enforcement agents observed ALONZO operate the aforementioned Volkswagen Jetta registered to his brother (i.e., ALPHONSO), retrieve the subject parcel from the rental property, and place it in the Jetta. Law enforcement agents then followed ALONZO as he drove the Jetta while transporting the subject parcel. ALONZO was the driver and sole occupant of the Jetta. ALONZO drove the subject parcel around Anchorage, making several stops, and ultimately stopping at a trailer on Birchwood Avenue in Anchorage that is the known residence of ALPHONSO.

11. On August 29, 2023, Alaska State Troopers executed Alaska State Search Warrant 3AN-23-03330 to search the residence and vehicles located at the Birchwood trailer, finding approximately 264 gross grams of blue round “M/30” stamped pills suspected to contain fentanyl, as well as several firearms, including a loaded handgun inside of the Volkswagen Jetta operated by ALONZO.

12. In the experience of the affiant, the above information is indicative of a highly sophisticated and large Drug Trafficking Organization (DTO). The coordination needed to procure and distribute controlled substances of the above-mentioned quantities requires a large network of co-conspirators and is indicative of a DTO being in operation for a considerable amount of time.

CONCLUSION

13. For the reasons described above, based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that ALONZO WILLIAMS

and ALPHONSO WILLIAMS committed the offenses described in the attached complaint. Accordingly, I ask the Court to issue the complaint and arrest warrants for the defendants in accordance with Federal Rule of Criminal Procedure 4(a).

RESPECTFULLY SUBMITTED,

Alex L. Brown

Digitally signed by Alex L. Brown
Date: 2023.08.30 17:17:38 -08'00'

ALEXANDER L. BROWN

United States Postal Inspector, United
States Postal Inspection Service (USPIS)

Subscribed and sworn pursuant to Fed. R.
Crim. P. 4.1 and 41(d)(3) on this 30th day
of August 2023.



HON. KYLE F. REARDON
United States Magistrate Judge
District of Alaska